

2600 Maitland Center Pkwy.

Suite 300

Maitland, FL 32751

P.O. Drawer 200

Winter Park, FL

32790-0200

Tel: 407-740-8575

Fax: 407-740-0613

www.tminc.com

February 13, 2009

Via ECFS

Ms. Marlene H. Dortch, FCC Secretary

Office of the Secretary

Federal Communications Commission 445 12th Street, SW, Suite TW-A325

Washington, DC 20554

RE: Annual 64.2009(e) CPNI Certification for:

Telephone Associates, Inc. - Form 499 Filer ID 817174

Dear Ms. Dortch:

Enclosed for filing is the 2008 CPNI Compliance Certification submitted on behalf of Telephone Associates, Inc. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 09-9 issued January 7, 2009.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to mbyrnes@tminc.com.

Sincerely,

Monique Byrnes

Consultant to Telephone Associates, Inc.

Marique Gynnes

Attachment

cc:

FCC Enforcement Bureau (provided via ECFS)

Best Copy and Printing (via email to FCC@BCPIWEB.COM)

D. Anderson – Telephone Associates

file:

Telephone Associates- CPNI

tms:

FCCx0901

Annual 64.2009(e) CPNI Certification for:

Calendar Year 2008

Date Filed:

February 13, 2009

Name of Company covered by this certification:

Telephone Associates, Inc.

Form 499 Filer ID:

817174

Name of Signatory:

Kevin Hopkins

Title of Signatory:

President

I, Kevin Hopkins, certify and state that:

I am the President of Telephone Associates, Inc. and, acting as an agent of the company, that I have personal knowledge that Telephone Associates, Inc. has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification as Exhibit A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Kevin Hopkins, President

Telephone Associates, Inc.

Date

Attachment A Statement of CPNI Procedures and Compliance

Telephone Associates, Inc.

Calendar Year 2008

Telephone Associates, Inc.

Statement of CPNI Procedures and Compliance

Telephone Associates, Inc. ("Telephone Associates" or "Company") provides local and long distance services to its customers. The Company does not use CPNI for sales and marketing campaigns and has processes in place to ensure that is employees do not improperly use or disclose CPNI. The Company's actions described below are designed to thwart efforts by pretexters to obtain Company customer CPNI.

The Company requires that all access to CPNI be approved by a supervisor with knowledge of the FCC's CPNI requirements. Information regarding CPNI, including rules and procedures are available to Customer Service Representatives along with training on policies and procedures, to ensure its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. Corresponding disciplinary procedures are in place for violations of CPNI disclosure.

All customers in 2008 were provided information regarding CPNI: "Important Message About Your Customer Proprietary Network Information" which requested customers to select a password and a non-biographical verification question. Customers who did not reply and who contact the Company are verified through a call-back to the telephone number of record, or must provide call detail on the telephone call in order for the Company to verify the customer. At that time, a password is set up with the customer.

The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

Telephone Associates, Inc.

Statement of CPNI Procedures and Compliance (Page 2)

The Company has in place reasonable means to discover and protect against attempts to gain unauthorized access to its customers' CPNI. Telephone Associates has instituted an authentication procedure to safeguard the disclosure of CPNI over the telephone. Telephone Associates billing system is set up to provide a screen to its Service Representatives which automatically requires the Service Representative to ask for the customer's Password. Also, fields have been established in the Service Representative system to document the authenticating backup verification question and answer. There is also a data field for each customer account which lists any change to access of CPNI information that have occurred as a result of Company /Customer telephone contact or inquiry, such as name, date and password used to access the information, and Service Representative who made the change in the database. Reports can be run on all information in the Company database related to CPNI. Those reports are only provided to Company CPNI officers who have been given security roles.

The Company requires a Password to be provided to verify the customer's identity prior to release of any call detail information over the telephone. Service Representatives are trained not to prompt the customer for needed information. If the customer cannot provide the password, the call detail information will only be sent to the address of record, or the customer can be called back at the telephone number of record on file with the Company.

Further, the Company has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. The back-up authentication procedure requires the customer to determine the Verification Question and Answer.

Should a customer come into the Company office requesting information or wishing to review call detail information, the customer is asked to provide a valid photo ID.

Telephone Associates does not provide for account or call detail information to be accessed via the internet.

Telephone Associates, Inc.

Statement of CPNI Procedures and Compliance (Page 3)

The Company has in place procedures to notify law enforcement within seven (7) business days in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. The Company maintains a log of all breaches discovered and notifications made to the United States Secret Service (USSS) and the FBI, and to customers.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2008.